UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

July 5, 2005

Lynn M. Brogis
Director, Legal Services and Corporate Counsel
InteliData Technologies Corporation
11600 Sunrise Valley Drive, Suite 100
Reston, VA 20191

RE: Annual Report of Status of Remediation, October 2004
Former CEE Associates/InteliData Facility, 80 Pickett District Rd., New Milford, CT,
CTD044121697

Dear Ms. Brogis:

EPA has reviewed the Annual Report of Status of Remediation for 80 Pickett District Road, New Milford, CT dated October 2004, prepared by Environmental Resources Management (ERM). The purpose of this letter is to provide EPA's comments on the report. This letter also reiterates and discusses issues raised in recent correspondence from EPA. In addition, the letter identifies remaining data gaps for achieving the Migration of Contaminated Groundwater Under Control environmental indicator and requests a schedule for achievement of that environmental indicator and final remedy.

I. EPA Comments on the October 2004 Annual Report of Status of Remediation

GENERAL COMMENTS

1. *Section 2.2* discusses elevated concentrations of volatile organic compounds (VOCs) in soil and soil gas. Based on the text, laboratory analytical reports, and data summary tables, acetone and 2-butanone were detected in soils beneath the building's concrete slab floor. However, the soil gas samples were not analyzed for these compounds. Please include analyses for acetone and 2-butanone in future soil gas samples.

2. *Section 2.5: Revisions to Conceptual Site Model* states that with the receipt of groundwater data from the downgradient Neeltran property, "the essential limits of the VOC plume in the overburden have been defined." The contaminant concentrations detected in Neeltran well MW-17 do fall below the groundwater standards (CT Remediation Standard Regulations [RSRs], including the Surface Water Protection Criteria [SWPC] and Proposed Groundwater Volatilization Criteria [GWVC]). However, caution should be used in determining the plume's stability for several reasons. There were detectable concentrations of tetrachloroethylene (PCE); trichloroethylene (TCE); 1,1-dichloroethylene (1,1-DCE); cis-1,2-DCE; 1,1,1-trichloroethane (TCA); and 1,1-dichloroethane (DCA) in the Neeltran well

MW-17, and results from only one sampling event were provided. The analytical data provided from the Neeltran well was from a sample collected in 2003. TCE concentrations at monitoring well ERM-11, the nearest upgradient well to the Neeltran property, have been increasing slightly (95 ppb in 2001; 150 ppb in 2003, and 154 in 2004), and have consistently exceeded the proposed GWVC criteria. Well ERM-6, the next closest upgradient well, has shown increasing concentrations of DCA, DCE, methyl tert-butyl ether (MTBE), PCE, TCA, and TCE between 2001 and 2004. This could indicate that the plume is continuing to migrate eastward. Therefore, the 2003 data from MW-17 is helpful in determining the approximate extent of the overburden plume, but it does not allow for a determination of the stability of the overburden plume.

At least one additional sample should be collected from Neeltran well MW-17, to assess whether the overburden plume is stable. Data from additional downgradient monitoring points on the Neeltran property, such as MW-6, MW-8, and MW-16 should also be considered to address this question, if available. Additional groundwater data from these wells will be helpful in evaluating whether the overburden plume is defined and stable and whether the facility has met the requirements of the CA 750 EI, Migration of Contaminated Groundwater Under Control.

3. While Section 2.5 of the report states that the limits of the VOCs in overburden have been defined, there does not appear to be any discussion regarding defining the extent of the groundwater plume or evaluating plume stability in bedrock. A boring log and well construction diagram from Neeltran well MW-17 were not included in the report. However, it is presumed, based on the statements in Section 2.5, that it is an overburden well. In addition, the June 2002 Summary Report and Phase III Work Plan states that "it appears that no true bedrock wells have been installed on the [Neeltran] property. It is anticipated that the installation of up to four (4) bedrock wells will be needed to define the extent of the contaminant plume." Please provide a boring log and/or well construction diagram for Neeltran well MW-17, if available. If this well is an overburden well, the downgradient extent of groundwater contamination in bedrock has not been defined. Concentrations of TCE in excess of CT RSR criteria have been detected in BR-3, BR-5, and PW-1. In order for the facility to meet the requirements of the CA 750 EI, Migration of Contaminated Groundwater Under Control, the extent of groundwater contamination in bedrock must be defined and must be shown to be stable. Please propose an approach for defining the extent of these contaminants in bedrock groundwater and for evaluating the stability of the bedrock plume.

4. The report should include a discussion of elevated reportable detection limits (RDLs), such as those observed at BR-5 (sample SA08839-07), ERM-11 (SA08839-10), INJ-1 (SA08839-13), and ERM-13 (SA08749-03). Please assess the impact of elevated RDLs on data quality (noting constituents for which the RDL exceeded an applicable criterion), and describe how this problem will be addressed in subsequent site investigation.

5. Section 2.5 of the Report identifies the "stormwater vault" south of the building as a previously unidentified source of groundwater contamination. However, the report does not propose efforts to characterize any remaining contaminant source in this area. The June 2002

Summary Report and Phase III Work Plan identifies the need for additional efforts to assess the presence of cyanide, TPH, and VOCs in soils surrounding the VT-1 drywell (section 2.2.9.6, page 2-34). However, a letter dated January 19, 2004 to EPA from ERM stated that ERM's remedial approach to AOC would include placement of an Environmental Land Use Restriction on the area (3rd bullet on page 3). If the stormwater vault is a suspected source of groundwater contamination at the site, please provide additional information on the nature of the contaminant release and whether ongoing releases from the stormwater vault sediments or surrounding soil may be occurring. If ongoing contaminant releases are suspected, please propose additional soil/sediment investigation to characterize the nature and extent of the source of the contaminant releases.

SPECIFIC COMMENTS

6. *Section 2.2: VOCs in Soil and Soil Gas Beneath AOC-5, pp. 2-2 through 2-3.* This section indicates that elevated concentrations of VOCs, including TCE, PCE, and others, have been detected in soil gas beneath the concrete slab floor in the past, and additional soil gas samples were collected to better assess remedial alternatives. *Subsection 2.2.1: Media Assessment* states that acetone and 2-butanone were the only two VOCs detected in the soil samples collected. However, for future use of the report, please be aware that 1,1,1-TCA was also detected in sample Svmp-3a at 12 ug/kg.

7. *Section 2.3.1: Site Groundwater Sampling Program, p. 2-5.* The last paragraph of this section states that Figure 5 in Appendix C shows the estimated extent of the "VOC plume" in the overburden groundwater. However, for future use of the report, please be aware that this figure actually shows only TCE concentrations.

8. *Section 2.5: Revisions to Conceptual Site Model, p. 2-8.* The third paragraph of this section states that, based on the revised CSM, there are two distinct VOC plumes in groundwater at the facility. However, the only groundwater contaminant isoconcentration map provided with the report is for TCE and it shows only one plume. Please provide a figure clearly illustrating the two distinct VOC plumes.

9. *Section 3.2: Anticipated Activities, p. 3-1.* This section indicates there will be on-going groundwater monitoring to support remedial efforts. Based on these plans, it may be useful to collect seasonal depth-to-groundwater measurements, to determine an appropriate depth for the sparge/SVE system. Please provide an anticipated schedule for the on-going monitoring (i.e., monthly, quarterly, annually, etc.), and state whether additional data is expected to be provided by the Neeltran facility.

10. *Appendix B: Table 4.* Numerous soil gas samples exceeded the proposed CT RSR Residential Soil Vapor Volatilization Criteria for methylene chloride of 650 ppb. Please be aware, for future use of the report, that these exceedences are not reflected in the summary table. Exceedences were detected at sample locations SG-67 (670 ppb), SG-70 (690 ppb), SG-71 (700 ppb), SG-72 (1,400 ppb), Dup-2 (850 ppb), SG-74 (860 ppb), SG-68 (740 ppb), and SG-78 (860 ppb).

11. *Appendix C:* For future reporting, please identify AOCs on the figures for any readers who may not be familiar with the site.

12. *Appendix C: Figure 2 - TCE Isocons.* This figure has reportedly been updated to include recently collected soil gas data. However, the figure fails to identify any of the sample location names. Please provide a figure that is revised to include the location IDs found in the laboratory data reports (Appendix A) and the summary data tables (Appendix B: Tables 4 and 5). Also, the figure title should be revised to state that the figure represents soil gas concentrations.

13. *Appendix D: Neeltran, Inc. Documentation.* The FAX cover page used by HRP Associates, Inc. to transmit the Neeltran monitoring well data indicates that of the requested well data, MW-17 was the only well that was tested for VOCs. Please specify for which wells data were requested. Also, please specify which additional Neeltran monitoring wells (not previously requested) are sampled for VOCs, and how often samples are collected for VOC analysis. Please state whether the data provided by HRP Associates is the most recent data available.

14. *Appendix E: Pilot Study Work Plan.* The text of the Annual Report refers to the Work Plan for details on the SVE/sparge pilot study. The Work Plan in turn refers to several figures. However, no figures are included with the Work Plan. Please provide these figures to ensure an understanding of the pilot study. While many of the locations discussed in the Work Plan are identified on Figure 5, the locations of SVE-1 and SVE-2 do not appear to be shown. Please add these locations to Figure 5, unless they are shown in the Work Plan figures.

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15. *Appendix B: Table 3.* The right-hand side of Table 3 has been cut off. Please reformat the table so that all sample IDs and relevant data are provided.

16. *Appendix B: Table 4.* The column under sample location SG-92 is blank. Also, there is no corresponding laboratory analytical report for sample SG-92 (collected 4/30/2004). Please complete the table by filling in the corresponding data, provide an explanation why there is no data for sample SG-92, or delete the column, as appropriate.

17. *Appendix B: Table 4.* Some of the sample dates are not visible on pages 2 and 3 of Table 4. Please reformat the column widths to display the sample collection dates.

18. *Appendix B: Table 4.* The row for toluene data on pages 10 and 11 of Table 4 is blank. Please complete the table with the appropriate data.

II. Issues Raised in Previous Correspondence

EPA forwarded the completed Documenting Environmental Indicator Determinations Current Human Exposures Under Control checklist for 80 Pickett District Road, dated September 20, 2004, to Al Wergley of InteliData Technologies Corp. with a transmittal letter dated September 30, 2004. This section addresses issues raised in that in the completed checklist and the transmittal letter.

19. The completed Current Human Exposures Under Control checklist for 80 Pickett District Road noted, and the September 30, 2004 letter reiterated, that "volatile organic compounds (VOCs) have been detected in groundwater and soil gas in the vicinity of the 80 Pickett District Rd. facility building. Therefore, it is possible that VOCs are migrating into air inside the facility building." The checklist further stated that "for purposes of making environmental indicator determinations, EPA and the Occupational Safety and Health Administration (OSHA) have agreed that OSHA will generally take the lead role in addressing occupational exposures (EPA, 2002). EPA requests that, within 60 days of the date of this environmental indicator determination, InteliData provide written notice to the current owner of the 80 Pickett District Rd. facility that VOCs from subsurface contamination may be entering indoor air in the facility building and that InteliData provide a copy of this notice to EPA." EPA has not received a copy of any written notice, to the current owner of 80 Pickett District Rd., of the potential for VOCs from groundwater and/or soil gas to enter the facility building. Within 60 days of the date of this letter, please provide a copy of this written notice to EPA.

20. The completed Current Human Exposures Under Control checklist for 80 Pickett District Road stated the following:

    "An evaluation of groundwater use in the vicinity of the 80 Pickett District Rd. facility found that several homes located to the west and southwest of the facility were not connected to the public water system. It is suspected that these homes obtain water for household uses from private wells. Based on groundwater elevation data collected from monitoring wells at the facility, overburden and bedrock groundwater generally appear to flow toward the east and southeast. Therefore, contaminated groundwater is not reasonably expected to be moving in the direction of the homes without public water connection. While existing site data provides sufficient basis for making this environmental indicator determination, additional data should be collected for confirmation. Therefore, EPA recommends that InteliData complete the following tasks and report resulting data to EPA as soon as possible and no later than six months following the date of this environmental indicator determination:

    - Install a nested bedrock and overburden monitoring well on-site between suspected source areas of contaminants in groundwater and the residential properties with suspected private well use; guage the water levels in these wells simultaneous to the other monitoring wells on-site to generate groundwater contour maps; analyze groundwater samples collected from these wells for site-related contaminants; and

- Using existing site data plus boring logs from the nested wells requested above, develop geologic cross sections for the site, showing overburden stratigraphy and the surface of weathered and competent bedrock."

The October 2004 Annual Report of Status of Remediation stated that "the previously assumed source of VOCs, the former HWSA [hazardous waste storage area], which is located up-gradient of the VOC plume, was discounted as the likely major source of VOCs following the review and analysis of detailed groundwater sampling efforts." Instead, the "stormwater vault" south of the building and a release area beneath the center of the building are cited as the likely sources of groundwater contamination." The data presented in the report seems to support this revision to the site conceptual model. Monitoring wells BR-2 and ERM-7 are located between these newly identified potential source areas and the off-site wells. Therefore, additional monitoring points do not appear necessary to confirm that site groundwater is not migrating in the direction of the off-site wells. However, geologic cross sections of the site, showing overburden stratigraphy and the surface of weathered and competent bedrock would be useful for understanding site hydrogeology and for selecting monitoring locations for defining the nature and extent of groundwater contamination in bedrock. In the schedule requested in Section III of this letter, please include a scheduled date for submitting these cross sections to EPA.

III. Next Steps

As stated in EPA's September 30, 2004 letter to InteliData, the 80 Pickett District Road facility will be expected to achieve the *Migration of Contaminated Groundwater Under Control* environmental indicator and the goal of a final remedy. The Federal Register Notice dated July 27, 1990, entitled *Corrective Action for Solid Waste Management Units at Hazardous Waste Management Facilities; Proposed Rule* is currently the best reference guide for final remediation under the RCRA Corrective Action Program. Please let me know if you would like me to forward you a copy of this Federal Register Notice.

Migration of Contaminated Groundwater Under Control Environmental Indicator Data Gaps
The data gaps which need to be filled for the 80 Pickett District Road facility to achieve the Migration of Contaminated Groundwater Under Control environmental indicator are as follows:

- *Assessing the Stability of the Overburden Groundwater Contaminant Plume*: To achieve the Migration of Contaminated Groundwater Under Control environmental indicator, the migration of contaminated groundwater must be determined to have stabilized, such that contaminated groundwater is expected to remain within the "existing area of contaminated groundwater" as defined by the monitoring locations designated at the time of the environmental indicator determination. As noted in General Comment 2, in Section I of this letter, at least one additional sample should be collected from Neeltran well MW-17 and analyzed for site contaminants, to assess whether the overburden plume is stable. Groundwater contaminant data from additional downgradient monitoring points on the Neeltran property, such as MW-6, MW-8, and MW-16 should also be considered to address this question, if available. Data from these wells will be helpful in evaluating

whether the overburden plume is defined and stable and whether the facility has met the requirements of the CA 750 EI, Migration of Contaminated Groundwater Under Control.

- *Defining the Extent and Assessing the Stability of the Bedrock Groundwater Contaminant Plume:* As noted in General Comment 3, in Section I of this letter, while Section 2.5 of the report states that the limits of the VOC in overburden have been defined, there does not appear to be any discussion regarding defining the extent of the groundwater plume or evaluating plume stability in bedrock. A boring log and well construction diagram from Neeltran well MW-17 was not included in the report. However, it is presumed, based on the statements in Section 2.5, that it is an overburden well. In addition, the June 2002 Summary Report and Phase III Work Plan states that "it appears that no true bedrock wells have been installed on the [Neeltran] property. It is anticipated that the installation of up to four (4) bedrock wells will be needed to define the extent of the contaminant plume." Please provide a boring log and/or well construction diagram for Neeltran well MW-17, if available. If this well is an overburden well, the downgradient extent of groundwater contamination in bedrock has not been defined. Concentrations of TCE in excess of CT RSR criteria have been detected in BR-3, BR-5, and PW-1. In order for the facility to meet the requirements of the CA 750 EI, Migration of Contaminated Groundwater Under Control, the extent of groundwater contamination in bedrock must be defined and migration of contaminated groundwater must be shown to have stabilized. Please provide a proposed approach for defining the extent of these contaminants in bedrock groundwater and for evaluating the stability of the bedrock plume.

- *Monitoring Groundwater to Verify that Migration of Groundwater Contaminant Plume has Remained Stable*: Groundwater monitoring must be performed following a positive Migration of Contaminated Groundwater Under Control environmental indicator determination to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater." Please provide an anticipated schedule for groundwater monitoring (i.e., monthly, quarterly, annually, etc.), identify the wells at which groundwater contaminant concentrations will be monitored, specify the parameters for which groundwater samples will be analyzed, and state whether additional groundwater data is expected to be provided by the Neeltran facility.

Quality Assurance Project Planning

As EPA has noted in previous correspondence to InteliData, all data collection at 80 Pickett District Road should be performed in accordance with a Quality Assurance Project Plan (QAPP), approved by EPA or DEP. The purpose of the QAPP is to ensure that the sampling program is properly designed to obtain the type, quantity, and quality of data needed to support environmental decision making. In developing a QAPP, InteliData may follow the guidelines presented in the Quality Assurance Guidance for Conducting Brownfields Site Assessments, available at the following link: http://www.epa.gov/swerosps/bf/pdf/bfqag4.pdf. Previous responses from InteliData have stated that "the investigation being undertaken at this facility has focused on RSR issues. The data quality objectives approach has therefore been formulated to meet RSR criteria...A site-specific QAPP is not mandated under the RSR program and, in light

of time and the comprehensive requirements of the RSRs, a QAPP is not needed to meet the data quality objectives" (letter dated October 2, 2001 to EPA, prepared by ERM). However, the 80 Pickett District Road facility is subject to RCRA Corrective Action. The RCRA Corrective Action program in Connecticut was recently delegated to the CT DEP. It is stated in The State of Connecticut RCRA Program Description, Section VII. L, page 62, available at http://www.epa.gov/region1/topics/cleanup/Progdescripfinaldraft.pdf, that "Connecticut will follow the EPA guidance [Quality Assurance Guidance for Conducting Brownfields Site Assessments] for ensuring that facilities will achieve and document the general principles for quality assurance that are identified in the EPA guidance."

Schedule

The schedule included in the June 4, 2004 letter from Robert Drake and Kevin King of ERM to Stephanie Carr of EPA targeted achievement of the *Migration of Contaminated Groundwater Under Control* EI by August 2004. Within 60 days of the date of this letter, please provide an updated schedule for investigation and remediation at the former InteliData facility. In this schedule, please include the following, in addition to the information requested in item 20, above:

- scheduled dates for planning, implementing, and reporting the tasks requested in this letter, including the tasks necessary to fill the Migration of Contaminated Groundwater Under Control data gaps;
- the current target date for submittal to EPA, by InteliData, of a completed Documentation of Environmental Indicator Checklist documenting achievement of the *Migration of Contaminated Groundwater Under Control* environmental indicator;
- scheduled dates for the additional work necessary to achieve the goal of final remedy.

In addition, within 60 days of the date of this letter, please provide the information requested in General Comments 4 and 5; Specific Comments 8, 9, 12, 13, 14, 15, 16, 17, 18, and 19.

In the mean-time, please feel free to contact me at 617/918-1363 if you have any questions on this letter

Sincerely,

Stephanie Carr
RCRA Facility Manager

cc: Kevin King, ERM
Bob Drake, ERM
Patricia DeRosa, CT DEP Remediation Section North Western District Supervisor